

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
MIDDLE DIVISION**

<b>LAVENTA HARRIS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>CIVIL ACTION NO. 3:08-cv-00246-MEF</b>
	)	
<b>JAY JONES, SHERIFF OF</b>	)	
<b>LEE COUNTY SHERIFF'S</b>	)	
<b>DEPARTMENT, in his official and</b>	)	
<b>individual capacity and DEPUTY BILL</b>	)	
<b>MCGUIRE, of the Lee County</b>	)	
<b>Sheriff's Department, in his</b>	)	
<b>official and individual capacity,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION FOR LEAVE TO FILE A REPLY TO PLAINTIFF'S RESPONSE TO  
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

COME NOW Jay Jones, Sheriff of Lee County, Alabama, and Bill McGuire, Deputy Sheriff of Lee County, Alabama, the Defendants in the above-styled cause, and submit this Motion for Leave to File a Reply to Plaintiff's Response to Defendants' Motion to Dismiss Plaintiff's Amended Complaint. As grounds for this Motion, Defendants state as follows:

1. On May 23, 2008, the Defendants submitted their Motion to Dismiss Plaintiff's Amended Complaint as well as supporting brief.
2. On May 29, 2008, this Court entered an Order allowing the Plaintiff until June 5, 2008, to file her response to the Defendants' Motion.
3. Plaintiff filed her Response to Defendants' Motion on June 5, 2008.
4. Defendants are in need of an opportunity to address the Plaintiff's arguments in response to the Defendants' Motion.

WHEREFORE, PREMISES CONSIDERED, Defendants move for leave of court to file a Reply to Plaintiff's Response to Defendants' Motion to Dismiss Plaintiff's Amended Complaint on or before June 20, 2008.

Respectfully submitted this the 13th day of June, 2008.

**s/Jamie K. Hill**  
DARYL L. MASTERS, Bar No. MAS018  
JAMIE K. HILL, Bar No. HIL060  
Attorneys for Defendants  
WEBB & ELEY, P.C.  
7475 Halcyon Pointe Drive (36117)  
Post Office Box 240909  
Montgomery, Alabama 36124  
Telephone (334) 262-1850  
Fax (334) 262-1889  
Email: jhill@webbeley.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this the **13th day of June**, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Kathryn Mae Dickey, Esq.**

**s/Jamie K. Hill**  
OF COUNSEL